1 Honorable James L. Robart 2 3 4 5 6 7 8 UNITED STATES DISTRICT COURT WESTERN DISTRICT OF WASHINGTON 9 AT SEATTLE 10 THE HUMAN RIGHTS DEFENSE CENTER and MICHELLE DILLON, No. 2:18-cv-01442-JLR 11 Plaintiffs, JOINT STATUS REPORT AND 12 PROPOSED+ORDER 13 Noted on Motion Calendar U.S. DEPARTMENT OF HEALTH AND February 24, 2020 14 **HUMAN SERVICES, ADMINISTRATION** FOR CHILDREN AND FAMILIES, and 15 OFFICE OF REFUGEE RESETTLEMENT, 16 Defendants. 17 18 Plaintiffs THE HUMAN RIGHTS DEFENSE CENTER ("HRDC") and 19 MICHELLE DILLON (collectively, "Plaintiffs") and Defendants U.S. DEPARTMENT OF 20 HEALTH AND HUMAN SERVICES, ADMINISTRATION FOR CHILDREN AND 21 FAMILIES and OFFICE OF REFUGEE RESETTLEMENT (collectively, "Defendants") 22 hereby provide the Court with a Joint Status Report pursuant to the Court's January 10, 23 2020 Order (Dkt. No. 44). 24 Since the last Joint Status Report (Dkt. No. 43), filed on January 9, 2020, 25 Defendants have made what they contend is the final production in response to Plaintiffs' 26

1 requests. Plaintiffs currently are evaluating the production and anticipate having certain 2 questions for Defendants. 3 In light of Defendants' representation that all Serious Incident Report spreadsheet summaries have been produced and that all responsive claim and complaint documents 4 5 have been produced and in light of the Plaintiffs' ongoing evaluation of the documents produced to date, the parties propose that a joint status report be filed approximately one 6 7 month from today, on or before March 27, 2020. 8 Dated: February 24, 2020 Respectfully submitted, 9 ARETE LAW GROUP PLLC 10 By: /s/ Jeremy E, Roller 11 Jeremy E. Roller, WSBA No. 32021 1218 Third Avenue, Suite 2100 12 Seattle, WA 98101 Telephone (206) 428-3250 13 Fax (206) 428-3251 iroller@aretelaw.com 14 Attorneys for Plaintiffs The Human Rights 15 Defense Center and Michelle Dillon 16 BRIAN T. MORAN 17 United States Attorney 18 By: /s/ Michelle R. Lambert 19 Michelle R. Lambert, NYS # 4666657 Assistant United States Attorney 20 United States Attorney's Office 700 Stewart Street, Suite 5220 21 Seattle, WA 98101 Telephone (206) 553-7970 22 Fax (206) 553-4073 michelle.lambert@usdoj.gov 23 Attorneys for Defendants 24 25 26

TPROPOSED] ORDER It is hereby ORDERED that: The parties shall submit a joint status report to the Court on or before March 27, 2020. Dated this 24 day of February, 2020 Honorable James L. Robart United States District Court Judge

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1	CERTIFICATE OF SERVICE
2	I hereby certify that on this date, I electronically filed the foregoing document with
3	the Clerk of the Court using the CM/ECF system, which will send notification of such filing
4	to the following:
5	MICHELLE R. LAMBERT, NYS #466657
6	Assistant United States Attorney United States Attorney's Office
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9	Fax: (206) 553-4073 Email: michelle.lambert@usdoj.gov
10	Attorneys for Defendants
11	inornoyo yor Doyenauna
12	DATED: February 24, 2020, at Seattle, Washington.
13	s/ Annabel Barnes
14	Annabel Barnes, Legal Assistant
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